

## **National Food Security Act Manual, Fourth Edition**

### **Part 519 — Quality Assurance**

#### **Subpart A — HELC/WC Quality Assurance Reviews**

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# National Food Security Act Manual, Fourth Edition

## Part 519 — Quality Assurance

### Subpart A — HELC/WC Quality Assurance Reviews

#### 519.01 General Information

##### a Quality Reviews

Quality Control and Assurance activities are conducted to ensure that NRCS properly carries out its responsibilities for HELC/WC provisions. Quality Assurance reviews often present an opportunity for commendations for current actions as well as recommendations for improvement.

##### b Purpose

The NRCS Chief will establish a process for ensuring that the HELC/WC program responsibilities are carried out in a manner that meets the requirements of the law, regulation, and agency policy.

##### c Quality Assurance Responsibilities

The Deputy Chief for Strategic Planning and Accountability will—

- Be responsible for quality assurance in the nation.
- Ensure that any new HELC/WC policies or procedures are implemented efficiently and uniformly among the States.
- Ensure consistent and uniform wetland determinations and/or delineations among the States.
- Coordinate soil mapping unit erosion rates permitted across State lines.

The State Conservationist will—

- Initiate quality control procedures consistent with HELC/WC policy in this manual, specific conservation program policy, and in [GM-300, Part 400](#), [GM-330, Part 405](#), and [GM-450, Part 407](#).
- Ensure consistent and uniform highly erodible land and wetland determinations and/or delineations within the State and between adjacent States.
- Ensure that actions taken pertaining to requests for variances are executed and completed within the specified time frames and as set forth in this manual.
- Ensure that execution of policy is consistent and uniform within the State and among adjacent States.
- Ensure that State quality control reviews are conducted.
- Ensure that corrective action is taken to address deficiencies found in status and quality reviews.
- Determine if additional reviews are required.
- Provide training and followup to correct deficiencies.
- Identify potential cases of fraud, waste, and abuse.



## 519.02 Guidelines for Quality Assurance Reviews

### a Procedure

In conducting quality assurance reviews:

- Conduct complete and comprehensive reviews.
- Coordinate the review schedule with all parties to the review.
- Randomly select—
  - Field offices and tracts for reviews, if the quality assurance review is completed by the State Office.
  - State, Area, and Field offices and tracts for reviews if the reviews are done at the National level.
- Conduct an entrance and an exit conference.
- Outline all of the findings and recommendations for needed corrective action.
- When a prior decision is found to be in error, change the prior decision to reflect the correct findings. All parties to the incorrect decision shall be notified, and appeal rights, if applicable, shall be provided as set forth in the [CPM, Part 510](#).
- Ensure that corrective action is taken to address deficiencies found within an appropriate time frame.
- Provide information copies of all quality reviews completed by the National level to the appropriate division directors, including—
  - Narrative of the review findings.
  - Recommendations for improvement of NRCS operations.
  - Corrective actions that need to be taken and the timeline for completing all actions.

### b Reports

A detailed report of the quality assurance activities, findings, and recommendations shall be prepared that sets forth the following:

- Purpose and/or objectives
- Participants
- Background: total tracts, tracts reviewed, offices visited, approved variances, State quality control plan implementation, conservation plan quality, etc.
- Scope of review (identified deficiencies)
- Findings:
  - Recommendations to correct identified deficiencies
  - Agreed-to items and response dates
  - Appropriate commendations
- Signature of the reviewing official.
- Copies to the appropriate division directors if the review was conducted by NHQ.

### c Quality Assurance Agreement

A quality assurance agreement shall be developed that will set forth:

- A table of all corrective and recommended actions.
- A schedule for completion of corrective actions.

**d      Quality Assurance Followup**

The appropriate NRCS official shall—

- Document all action taken in response to any agreed to items.
- Report, in detail, on all actions taken to the next-higher level of supervision.

## 519.03      **Quality Control Reviews**

### **a      Items Covered in a Quality Control Review**

All NRCS work for the HELC/WC provisions will be incorporated in the State quality control review, including the following:

- A sample of all HEL and Wetland Determinations and/or delineations.
- Outline of wetlands on FSA base maps/digital orthophotography.
- Conservation program eligibility determinations where HELC/WC compliance is a condition of program eligibility and/or participation.
- HEL conservation plan and/or conservation system implementation.
- Status reviews previously completed, including variance and exemptions granted.
- A sample of all appeals of HELC or WC determinations and/or delineations.

### **b      Content of a Quality Control Review**

The Quality Control Review will include, as appropriate—

- Staff assignments for quality control functions.
- Actions and procedures to be used to ensure quality of all completed status reviews and/or other HELC/WC activities.
- Training activities scheduled and/or completed that were held to correct identified deficiencies from current and prior years, and other scheduled training.
- Other actions needed to correct deficiencies.
- Specific staff assignments for action items.
- Specific timing for completion of action items.
- Procedures to be followed in conducting quality reviews including written notification to field offices of deficiencies found.
- Procedure for ensuring that "not actively applying" determinations made during quality reviews have an FSA-569 issued.
- Guidance on the delegation of authority and the use and/or approval of status review variances.
- Guidance issued on the release of information regarding HELC/WC records under the Freedom of Information Act and the Privacy Act.
- State guidance on national policy to be followed on servicing appeals, complaints, and possible violations.
- The official list of NRCS employees who own or operate farms subject the HELC/WC provisions, updated annually.
- A review to ensure that all status reviews have been completed as set forth in NFSAM, [Part 518](#), and in a timely manner.

### **c      Conducting Quality Control Reviews**

Quality control reviews shall be conducted—

- In accordance with the following NRCS policy—
  - [GM-120, Part 404](#)
  - [GM-120, Part 408](#)
  - [GM-180, Part 409](#)
  - [GM-450, Part 401](#)
  - [GM-450, Part 407](#)

- [National Planning Procedures Handbook \(NPPH\)](#)
- [National Food Security Act Manual \(NFSAM\)](#)
- [Conservation Programs Manual \(CPM\)](#)
- Emergency Watershed Program Manual (EWPM) (This document is currently under development)
- National Watershed Manual (NWM)
- [National Agronomy Manual \(NAM\)](#)
- National Range and Pasture Handbook (NRPH)
- National Handbook of Evaluations, Audits, Investigations, and Reviews (NHEAIR) (This document is currently under development)
- By persons from outside the subject NRCS office.
- If appropriate, in coordination with the local FSA office.
- Throughout the year and coordinated with other conservation program quality assurance activities.
- To include tracts having current year activity including both positive and negative determinations, and variances granted.
- To include specific tracts selected by NHQ.
- To include all new activity on NRCS employee-owned and/or employee-operated land having current year activity, including positive and/or negative determinations.

**d Errors with Prior Determinations and/or Delineations**

When a prior technical determination and/or decision is found to be in error during a quality control review, the following actions will be taken:

- The prior incorrect technical determination and/or decision will be changed to reflect the correct finding.
- Appropriate notifications shall be made to all parties potentially affected by the changed determination and/or decision.
- Appeal and mediation rights will be provided as set forth in the [CPM, Part 510](#).